IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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) No: 15-C-11222
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Hon. Robert W. Gettleman
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Magistrate Judge Geraldine Brown
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PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO MOTIONS TO DISMISS FILED BY DEFENDANTS HARBOUR CONTRACTORS, INC. AND ENVIRONMENTAL DESIGN INTERNATIONAL, INC.

Plaintiff DT Boring, Inc. ("DT"), by one of its attorneys, Bruce Rose, respectfully requests a one-week extension of time to, and including March 24, 2016 to file its responses to the motions to dismiss filed by defendants Harbour Contractors, Inc. and Environmental Design International, Inc., and in support thereof, states as follows:

- 1. Defendants Harbour Contractors, Inc. ("Harbour") and Environmental Design International, Inc. ("EDI") have each filed motions to dismiss DT's *Complaint* in this case.
- 2. Through a combination of factors, including extensions of time granted to opposing counsel in other cases, Rose has ended up with a convergence of due dates for filing pleadings and briefs in those other cases, as well as in this one, all falling within the last three weeks.
- 3. Those due dates include filing the appellee's brief in *Armstrong* v. *Armstrong*, 02-16-0815, an appeal pending in the Illinois Appellate Court, Second District due on March 2, 2016, filing the *Second Amended Complaint* in *District Recovery, Inc.* v. *Radwanski*, 08 CH 10532 pending in the Circuit Court of Cook County which was due on March 9, 2016, as well as DT's responses to Harbour's and EDI's motions to dismiss pending before this Court.

- 4. DT's undersigned counsel has been working on DT's responses to the motions to dismiss but, for example, Harbour's motion, filed without the Court's prior approval is 23 pages long, which means that DT's counsel is actually responding to 2 ½ motions, rather than just two.
- 5. DT's undersigned counsel can complete and file DT's responses within one week of the filing of this motion, *i.e.*, on or before March 24, 2016.

WHEREFORE, plaintiff DT Boring, Inc. respectfully requests a one-week extension of time to, and including March 24, 2016 to file its responses to the motions to dismiss filed by defendants Harbour Contractors, Inc. and Environmental Design International, Inc.

Respectfully submitted,

Plaintiff DT Boring, Inc.

/s/ Bruce Rose

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Atty. No. 3125523

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CERTIFICATE OF SERVICE

I, the undersigned, certify that I filed this document and all exhibits or attachments through the Court's ECM/CF system, which will cause electronic notification of this filing to be sent to all counsel of record shown below on March 18-2016.

/s/ Bruce Rose_

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